Stackpole, Peter

From:

Jones, Will

Sent:

Wednesday, April 25, 2007 7:44 AM

To:

Stackpole, Peter; Clark, Dennis

Cc:

Ransick, Richard; Corbett, Chris; DeMasi, Mose; Miller, Chris A (CITY-FIRE)

Subject:

RE: Samuel v. Hoog. Citv's Responses to Subpoena for Records

Importance: High

Peter.

District Chief Dennis Clark 357-7511 cell 702-9232 is Rescue 1. He supervises Rescue 2. He will assist with your records request for R-1 & R-2

Thanks

Will R Jones District Fire Chief Cincinnati Fire Department Office (513) 564-1743 Cell (513) 368-1721

> ----Original Message----From: Stackpole, Peter

Sent: Tuesday, April 24, 2007 4:29 PM

To: Jones, Will Cc: Ransick, Richard

Subject: FW: Samuel v. Hoog, City's Responses to Subpoena for Records

DC Jones,

As you know, this case has entailed extensive discovery. We've been going through a number of records at CFD IIS, but the plaintiff wants to inspect the records at Rescue 1 and 2. Frankly, I don't know where these records are kept. Please see the attached correspondence from plaintiff's counsel detailing what records she is looking for.

I would like to be as cooperative as possible because I am getting ready to file a motion for summary judgment and I don't want them to be able to argue that we did not give them everything.

I apologize for the inconvenience. If you need anything else from me so that we can respond to this letter, please let me know.

Thanks, Pete

From: Langsam, Dorothea K. [mailto:dklangsam@vssp.com]

Sent: Monday, April 09, 2007 4:04 PM

To: Stackpole, Peter

Subject: Samuel v. Hoog, City's Responses to Subpoena for Records

Please see the attached letter.



Dorothea (Thea) Langsam, Esq. Vorys, Sater, Seymour and Pease LLP Suite 2000, Atrium Two 221 East Fourth Street Cincinnati, OH 45202 Direct dial: (513) 723-4094

Direct fax: (513) 852-7858 dklangsam@vssp.com

From the law offices of Vorys, Sater, Seymour and Pease LLP.

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